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SEP 22 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

September 22, 1997

BY HAND DELIVERY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW, Room 222
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: MM Docket No. 97-168
RM-9103
Arcadia, Missouri

Dear Mr. Caton:

Transmitted herewith, on behalf of Lyle Broadcasting Corporation, licensee of Station WCIL-FM, Carbondale, Illinois, are an original and four copies of its "Comments and Counterproposal" in the above-referenced proceeding.

Should any questions arise concerning this matter, please communicate with the undersigned.

Very truly yours,

FLETCHER, HEALD & HILDRETH, P.L.C.

Frank R. Jazzo
Frank R. Jazzo
Counsel for Lyle Broadcasting Corporation

Enclosures

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BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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SEP 22 1997
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Section 73.202(b),) MM DOCKET NO. 97-168
Table of Allotments,) RM-9103
FM Broadcast Stations.)
(Arcadia, Missouri)

COMMENTS AND COUNTERPROPOSAL

Lyle Broadcasting Corporation ("Lyle"), licensee of Station WCIL-FM, Carbondale, Illinois, by its attorneys, hereby respectfully submits its Comments and Counterproposal with regard to the Commission's Notice of Proposed Rule Making, DA 97-1599, released August 1, 1997 ("NPRM"). With respect thereto, the following is stated:

1. In its NPRM, the Commission has proposed the allotment of Channel 269A to Arcadia, Missouri, as that community's first local broadcast service. Lyle proposes herein that either Channel 247A or Channel 280A be allotted to Arcadia in lieu of Channel 269A. In addition, Lyle proposes that Channel 268C1 be substituted for Channel 268B at Carbondale, Illinois, and that the license for WCIL-FM be modified to specify operation on the higher class channel.¹

2. In order to accommodate the requested changes, it will be necessary to impose a site

¹ As the reference co-ordinates proposed for the new channel fall within Zone II, the allotment of a Class C1 channel at these co-ordinates is permitted pursuant to Section 73.210(a) of the Commission's Rules.

restriction on a vacant allotment on Channel 267C3 at Tiptonville, Tennessee.² Additionally, if Channel 247A is allotted to Arcadia, it will be necessary to substitute Channel 228A for Channel 247A at Marble Hill, Missouri, while if Channel 280A is allotted to Arcadia, it will be necessary to substitute Channel 294A for Channel 280A at Ellington, Missouri. Construction permits for unbuilt stations are currently outstanding at both Marble Hill and Ellington.³ As set forth in the attached Engineering Statement, both the proposed substitution at Marble Hill and the proposed substitution at Ellington can be made in accordance with the Commission's Rules.

3. As a secondary, alternative counterproposal, in the event that the Commission does not impose a site restriction on Tiptonville, Lyle proposes to substitute Channel 268C1 for Channel 268B at Carbondale and to reallocate the channel to Steeleville, Illinois. In order to accommodate this change, it will again be necessary to make the substitutions outlined above at Arcadia and either Marble Hill or Ellington.

² A proposal has been made in MM Docket 96-204 to delete Channel 267C3 at Tiptonville and to substitute Channel 267C3 for Channel 269A at Martin, Tennessee. If that proposal is adopted, no site restriction would be required.

³ Lyle will reimburse the expenses of the permittees in connection with the proposed change in channels as required by the Commission's rules and policies.

4. Thus, Lyle is proposing to amend the Table of Allotments as follows:

Option 1

	<u>Current</u>	<u>Proposed</u>
Tiptonville, Tennessee	267C3	267C3 - site restriction ⁴
Carbondale, Illinois	268B	268C1
Arcadia, Missouri	-----	247A
Marble Hill, Missouri	247A	228A

Option 2

	<u>Current</u>	<u>Proposed</u>
Tiptonville, Tennessee	267C3	267C3 - site restriction ⁵
Carbondale, Illinois	268B	268C1
Arcadia, Missouri	-----	280A
Ellington, Missouri	280A	294A

Option 3 - Alternative Counterproposal 1

	<u>Current</u>	<u>Proposed</u>
Tiptonville, Tennessee	267C3	267C3
Carbondale, Illinois	268B	-----
Steeleville, Illinois	-----	268C1
Arcadia, Missouri	-----	247A
Marble Hill, Missouri	247A	228A

⁴ As set forth above, it has been proposed that this allotment be deleted and that the channel be reallocated to Martin. In that event, Lyle's proposed allotment would be fully spaced to the Martin allotment, and no site restriction would be required.

⁵ As set forth above, it has been proposed that this allotment be deleted and that the channel be reallocated to Martin. In that event, Lyle's proposed allotment would be fully spaced to the Martin allotment, and no site restriction would be required.

Option 4 - Alternative Counterproposal 2

	<u>Current</u>	<u>Proposed</u>
Tiptonville, Tennessee	267C3	267C3
Carbondale, Illinois	268B	-----
Steeleville, Illinois	-----	268C1
Arcadia, Missouri	-----	280A
Ellington, Missouri	280A	294A

5. Lyle's proposed changes in the FM Table of Allotments clearly would serve the public interest. By adopting the channel substitutions proposed herein, not only would the community of Arcadia, Missouri receive a first local broadcast transmission service, but Lyle would be able to provide additional and improved service to a large number of people. The substitution at Arcadia would provide the community with a channel equivalent to that proposed by Iron County Broadcasting Company in its Petition for Rule Making. Indeed, two alternative channels are available for use at Arcadia.

6. Furthermore, Lyle's proposed Channel 268C1 facility would be able to serve 52.6 percent more people than its current facility. As set forth in the Engineering Statement at Table 2.7, WCIL-FM currently serves an area of 8,560.3 square kilometers and a population of 245,026. The proposed facility would serve an area of 16,422 square kilometers and a population of 373,801. The proposed modification also would create a loss area of 1,321.2 square kilometers and 27,503 people. All of this area is well-served by other stations, as the entire area receives at least five other full-time aural services. Thus, the net gain in area is 7,861.7 square kilometers and 128,775 people. Clearly, the net gain figures reflect a significant increase in service.

7. This increase in service would have no countervailing public interest detriment. The substitution of equivalent channels at Arcadia would not affect Iron County's ability to provide a first local broadcast transmission service to that community. It should be noted, however, that Iron County's claim that its proposed Channel 269A facility would be able to provide a second full-time aural service to a portion of its proposed service area is inaccurate. As demonstrated in the attached Engineering Statement, Iron County's proposed facility would provide a fifth full-time service to an area of less than one square kilometer, while the remainder of the proposed service area already receives five or more full-time aural services.

8. Furthermore, the proposed site restriction at Tiptonville will not unduly limit the use of Channel 267C3 there, assuming that the allotment is retained. The proposed site restriction is only 9.6 kilometers southeast of Tiptonville. The proposed new Tiptonville reference coordinates are the very site which was specified in the former construction permit for WAAT(FM) to operate on this channel. That construction permit has now been canceled and the call sign deleted due to the former permittee's failure to construct the station. Nevertheless, the site remains a viable one, and a station could easily provide the required city grade coverage of Tiptonville from there. See Engineering Statement at Figure 2.1.

9. Likewise, the proposed channel substitutions at either Marble Hill or Ellington will have no public interest drawbacks. Whichever option is adopted proposes the substitution of an equivalent class channel. Furthermore, both options involve construction permits for stations which are as yet unbuilt. Accordingly, the change in channel would cause no disruption to the public, as there will be no change in any existing service upon which listeners now rely.

10. Obviously, therefore, the public interest would be served by amending the FM Table of Allotments as set forth in Option 1 or Option 2 above. Both options would provide for a first local broadcast transmission service at Arcadia and a substantial upgrade for WCIL-FM.

11. In the event that the Commission will not impose a site restriction at Tiptonville, and in the event that this allotment is not deleted, Lyle alternatively proposes to substitute Channel 268C1 for Channel 268B at Carbondale and to reallocate the channel from Carbondale to Steeleville, Illinois as its first local broadcast transmission service. This proposal is in accordance with the Commission's policies concerning changes in communities of license.

Modification of FM and TV Authorizations to Specify a New Community of License, 5 FCC Rcd 7094 (1990). The relocation of WCIL-FM would not deprive Carbondale of its only local transmission service, as WCIL(AM) and noncommercial educational stations WDBX(FM) and WSIU(FM) would remain. Like Options 1 and 2, either Option 3 or Option 4 would allow for a significant upgrade in the facilities of WCIL-FM.

12. In addition, the proposed relocation of WCIL-FM would provide Steeleville with its first local transmission service, and thus would serve the Commission's third FM allotment priority. FM Channel Assignment Policies, 90 F.C.C.2d 88 (1982). The community of Steeleville has a population of 2,059, according to the 1990 U.S. Census. It is a banking town and has a post office with its own zip code. Rand McNally Commercial Atlas and Marketing Guide 1996 at 323. Additionally, Steeleville is served by the Union Pacific Railroad. Id. Thus, Steeleville is a community deserving of an allotment for its own local broadcasting service.

13. The proposed upgrade of WCIL-FM and its relocation to Steeleville would require the same changes in the proposed allotment for Arcadia and the allotment for either Marble Hill

or Ellington as set forth above. As stated above, none of these changes would disrupt service to the public or have any detrimental impact.

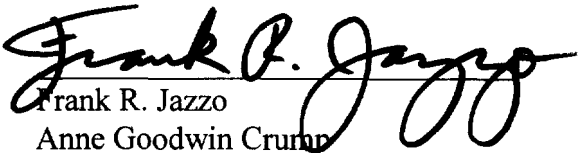
14. In sum, whichever of Lyle's proposals is adopted by the Commission would serve the public interest, whether it is Option 1 or Option 2, or the alternative counterproposal Option 3 or Option 4. All of these options would result in a first local broadcast transmission service at Arcadia and an upgrade for WCIL-FM which would allow it to serve 52.6 percent more people.

15. If Channel 268C1 is allotted to either Carbondale or Steeleville, Lyle will file an application for construction permit to effectuate the change in the allotment for WCIL-FM and, if that application is granted, will promptly construct its Channel 268C1 facilities as authorized.

Respectfully submitted,

LYLE BROADCASTING CORPORATION

By:


Frank R. Jazzo
Anne Goodwin Crump

Its Attorneys

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September 22, 1997

ENGINEERING STATEMENT IN
SUPPORT OF COMMENTS
AND COUNTERPROPOSAL

MM DOCKET 97-168

Lyle Broadcasting Corp.
Carbondale, IL

September 18, 1997

Prepared for: Mr. David Obergonner
Lyle Broadcasting Corp.
P.O. Box 1610
Cape Girardeau, MO 63702

CARL E. SMITH CONSULTING ENGINEERS

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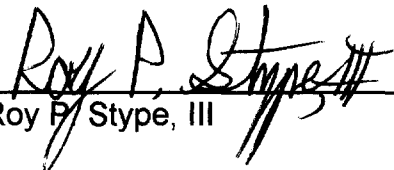
Fig. 4.0 - Predicted 1 mV/m Contour
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ENGINEERING AFFIDAVIT

State of Ohio)
) ss:
County of Summit)

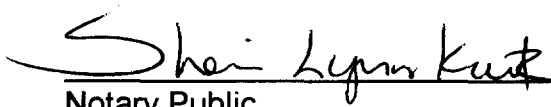
Roy P. Stype, III, being duly sworn, deposes and states that he is a graduate Electrical Engineer, a qualified and experienced Communications Consulting Engineer whose works are a matter of record with the Federal Communications Commission and that he is a member of the Firm of "Carl E. Smith Consulting Engineers" located at 2324 North Cleveland-Massillon Road in the Township of Bath, County of Summit, State of Ohio, and that the Firm has been retained by the Lyle Broadcasting Corporation to prepare the attached "Engineering Statement In Support Of Comments And Counter-proposal - MM Docket 97-168."

The deponent states that the Exhibit was prepared by him or under his direction and is true of his own knowledge, except as to statements made on information and belief and as to such statements, he believes them to be true.



Roy P. Stype, III

Subscribed and sworn to before me on **September 18, 1997.**



Notary Public

SHERI LYNN KURTZ, Notary Public
Residence - Summit County
State Wide Jurisdiction, Ohio
My Commission Expires June 14, 2000

/SEAL/

ENGINEERING STATEMENT

1.0 - GENERAL

This engineering statement is prepared on behalf of the Lyle Broadcasting Corporation, licensee of Radio Station WCIL-FM - Carbondale, Illinois, which presently operates on Channel 268B. It supports comments and a counterproposal in MM Docket 97-168, which proposes to allot Channel 269A to Arcadia, Missouri. The data contained in this engineering statement documents that WCIL-FM can be upgraded to a Class C1 facility while still allotting a new Class A channel to Arcadia.

Section 2.0 of this engineering statement contains the complete details of a counterproposal to substitute Channel 268C1 for Channel 268B in Carbondale for use by WCIL-FM, while allotting either Channel 247A or Channel 280A to Arcadia. In order to accomplish this upgrade for WCIL-FM, it is also necessary to impose a site restriction on a vacant allotment on Channel 267C3 in Tiptonville, Tennessee. Additionally, it will be necessary to substitute Channel 228A for Channel 247A in Marble Hill, Missouri, to accommodate the allotment of Channel 247A to Arcadia or to substitute either Channel 292A or Channel 294A for Channel 280A in Ellington, Missouri, to accommodate the allotment of Channel 280A to Arcadia.

Section 3.0 of this engineering statement outlines an alternate counterproposal to upgrade WCIL-FM to a Class C1 facility, which can be considered in the event that it proves impossible to modify the site restriction on Channel 267C3 in Tiptonville, Tennessee, to implement the scenario outlined in the primary counterproposal outlined above. This alternate proposal proposes to substitute Channel 268C1 for Channel 268B and reallocate this channel from Carbondale, Illinois, to Steeleville, Illinois, for use by WCIL-FM, which eliminates the need to modify the site restriction on the Tiptonville

allotment. This alternate proposal still requires the allotment of either Channel 247A or Channel 280A to Arcadia, in lieu of Channel 269A, as well as the channel substitution outlined above in either Marble Hill, Missouri, or Ellington, Missouri, to accommodate the alternate Class A channel in Arcadia.

The rulemaking petition in this proceeding claims that the allotment of Channel 269A to Arcadia will provide a second full time aural service to a portion of the proposed service area. As shown in Section 4.0 of this engineering statement, however, when evaluated pursuant to the standards outlined in the FCC's March 11, 1991, Memorandum Opinion and Order in MM Docket 86-29 (Greenup, Kentucky and Athens, Ohio) the entire area within the proposed Channel 269 service area receives at least four full time aural services, with all except a very small area (less than 1 square kilometer) receiving five or more full time aural services. Thus, the claim that the allotment of Channel 269A to Arcadia will provide a second full time aural service to any area is totally without merit.

In summary, the data contained in this engineering statement documents that Channel 268C1 can be substituted for Channel 268B for use by WCIL-FM, provided that an alternate channel is allotted to Arcadia and an appropriate channel substitution is made in either Marble Hill, Missouri, or Ellington, Missouri. This upgrade for WCIL-FM can be accomplished without changing the station's community of license, provided that a site restriction is imposed on a vacant allotment on Channel 267C3 in Tiptonville, Tennessee. Alternatively, if such a site restriction cannot be imposed on the Tiptonville allotment, this upgrade can be accomplished by changing the WCIL-FM community of license from Carbondale, Illinois, to Steeleville, Illinois.

2.0 - COUNTERPROPOSAL - CHANNEL 268C1 - CARBONDALE, IL

The geographic reference coordinates for Carbondale are:

NL - 37° 43' 38"

WL - 89° 13' 00"

The studies contained in this section of this exhibit were conducted from a site 39.4 kilometers west-southwest of Carbondale:

NL - 37° 37' 00"

WL - 89° 38' 30"

This site falls within Zone II, as defined by Section 73.205(c) of the FCC Rules. Accordingly, as outlined in Section 73.210(a) of the FCC Rules, the allotment of a Class C1 channel is permitted from these coordinates.

Table 2.0 is an FM allocation study for Channel 268C1 from the site described above. An examination of this table shows that operation on Channel 268C1 from this site would be short spaced to the present operation of WCIL-FM on Channel 268B, a vacant allotment on Channel 267C3 in Tiptonville, Tennessee, and the proposal in MM Docket 97-168 to allot Channel 269A to Arcadia, Missouri. Pursuant to the rounding provisions of Section 73.208(c)(8) of the FCC Rules, the 199.54 kilometer spacing to WBGW - Fort Branch, Indiana, is considered to comply with the required spacing of 200 kilometers.

The short spacing to the present operation of WCIL-FM on Channel 268B will not pose any problems since this channel will be deleted if Channel 268C1 is allotted to Carbondale, as proposed herein. Furthermore, under the provisions of Section 1.420(g) of the FCC Rules, this conflict with the existing operation of WCIL-FM will permit the license of WCIL-FM to be modified to specify operation on Channel 268C1, regardless of other expressions of interest which might be received.

The short spacing to the vacant allotment on Channel 267C3 in Tiptonville, Tennessee, can be eliminated by specifying an alternate site restriction for this allotment. Table 2.1 is an FM spacing study for Channel 267C3 in Tiptonville, which was conducted from a site 9.6 kilometers southeast of Tiptonville:

NL - 36° 19' 41"
WL - 89° 23' 18"

This is the site which was specified in the previous construction permit for WAAT(FM) to operate on this channel, which was subsequently canceled by the FCC for failure to construct. As shown in this table, operation on Channel 267C3 from this site would be short spaced to the proposal in MM Docket 96-204, to substitute Channel 267C3 for Channel 269A in Martin, Tennessee, for use by WCMT-FM. This short spacing should pose no problems, however, since the upgrade proposal for WCMT-FM requires the deletion of Channel 267C3 from Tiptonville. Thus, the proposal outlined herein is not contingent on the outcome of the proceedings in MM Docket 96-204, since, if Channel 267C3 is retained in Tiptonville, it will not be allotted to Martin, and if Channel 267C3 is allotted to Martin, it will not be retained in Tiptonville. If the former occurs, the imposition of the site restriction discussed above will permit Channel 268C1 to be allotted to Carbondale for use by WCIL-FM. On the other hand, if Channel 267C3 is deleted from Tiptonville, the need for such a site restriction vanishes.

Figure 2.1 is a map exhibit showing the predicted 3.16 mV/m (city grade) contour for the restricted site specified above for Channel 267C3 in Tiptonville. This contour was projected assuming maximum Class C3 facilities of 25 kilowatts effective radiated power at 100 meters above average terrain, assuming uniform terrain. As shown in this

figure, it will easily be possible to provide city grade service to all of Tiptonville on Channel 267C3 from this site.

The short spacing to the proposal to allot Channel 269A to Arcadia, Missouri, can be eliminated by allotting another channel to Arcadia in lieu of Channel 269A. As outlined below, there are two alternate Class A channels which can be allotted to Arcadia, each of which will require a frequency substitution for an unbuilt construction permit in another community.

Table 2.2 is an FM spacing study for Channel 247A, which was conducted from the reference coordinates for Arcadia:

NL - 37° 35' 00"
WL - 90° 38' 00"

As shown in this table, operation on Channel 247A from these reference coordinates would be short spaced to a construction permit for a new station on Channel 247A in Marble Hill, Missouri. This short spacing can be eliminated, however, by substituting another channel for Channel 247A in Marble Hill. Table 2.3 is an FM spacing study for Channel 228A, which was conducted from the site specified in the Marble Hill construction permit. As shown in this table, operation on Channel 228A from this site meets the spacing requirements to all other facilities requiring protection consideration.

Table 2.4 is an FM spacing study for Channel 280A, which was conducted from a site 8.7 kilometers southwest of Arcadia:

NL - 37° 32' 30"
WL - 90° 43' 00"

As shown in this table, operation on Channel 280A from these reference coordinates would be short spaced to a construction permit for a new station on Channel 280A in Ellington, Missouri. This short spacing can be eliminated, however, by substituting

another channel for Channel 280A in Ellington. Table 2.5 is an FM spacing study for Channel 292A and Table 2.6 is an FM spacing study for Channel 294A, both of which were conducted from the site specified in the Ellington construction permit. As shown in these tables, operation on either Channel 292A or Channel 294A from this site would meet the spacing requirements to all other facilities requiring protection consideration.

Figure 2.4 is a map exhibit showing the predicted 3.16 mV/m (city grade) contour for the site specified above for Channel 280A in Arcadia. This contour was projected assuming maximum Class A facilities of 6 kilowatts effective radiated power at 100 meters above average terrain, assuming uniform terrain. As shown in this figure, it will easily be possible to provide city grade service to all of Arcadia on Channel 280A from this site.

Figure 2.0 is a map exhibit showing the predicted 3.16 mV/m (city grade) contour for the site specified above for Channel 268C1 in Carbondale. This contour was projected assuming maximum Class C1 facilities of 100 kilowatts effective radiated power at 299 meters above average terrain, assuming uniform terrain. As shown in this figure, it will easily be possible to provide city grade service to all of Carbondale on Channel 268C1 from this site.

Figure 2.7 is a map exhibit showing the predicted 1 mV/m contour for Channel 268C1 in Carbondale for operation with maximum Class C1 facilities from the coordinates outlined above. This figure also shows the predicted 1 mV/m contour for operation by WCIL-FM with maximum Class B facilities from its present site. Both of these contours were projected assuming uniform terrain. Table 2.7 presents detailed data on the present and proposed populations and areas, as well as the loss and gain areas. It should be noted that the entire loss area is well served, receiving five or more full time

aural services in addition to the present service from WCIL-FM. Furthermore, the entire gain area receives at least two full time aural services. Thus, the proposed upgrade of WCIL-FM will not provide a second aural service to any area.

In summary, Channel 268C1 can be substituted for Channel 268B in Carbondale, Illinois, for use by WCIL-FM with a site restriction 39.4 kilometers west-southwest of the community, provided that the site restriction on Channel 267C3 in Tiptonville, Tennessee is modified and that either Channel 247A or Channel 280A is allotted to Arcadia, Missouri, in lieu of the proposed allotment of Channel 269A. The allotment of Channel 247A to Arcadia will require the substitution of Channel 228A for Channel 247A in Marble Hill, Missouri, and the allotment of Channel 280A to Arcadia will require the substitution of either Channel 292A or Channel 294A for Channel 280A in Ellington.

TABLE 2.0

FM ALLOCATION STUDY - CHANNEL 268C1 (101.5 MHz) - CARBONDALE, IL

LYLE BROADCASTING CORP.
CARBONDALE, IL

STUDY COORDINATES: 37/37/00 89/38/30

STATION	LOCATION	CHANNEL	CLASS	SPACING (km)	REQUIRED SPACING* (km)	NOTES
KWMU	St. Louis, MO	214	C	122.81	41.0	
KRCU	Cape Girardeau, MO	215	A	35.35	22.0	
KTUIFM	Sullivan, MO	265	A	150.28	75.0	
WVRV	East St. Louis, IL	266	C2	128.00	79.0	1
ALLOTMENT	Tiptonville, TN	267	C3	138.22	144.0	3, 11, 12
WCMTFM	Martin, TN	267	C3	144.46	144.0	9
ALLOTMENT	Tiptonville, TN	267	C3	144.77	144.0	10, 12
96-220	Sturgis, KY	267	A	146.53	133.0	9
96-204	Princeton, KY	267	A	157.68	133.0	9
WNCI	Neoga, IL	267	B1	212.12	161.0	
KTXR	Springfield, MO	267	C	295.28	209.0	
WCILFM	Carbondale, IL	268	B	36.02	270.0	11
WBGW	Fort Branch, IN	268	A	199.54	200.0	
WTPRFM	Mckinnon, TN	268	A	200.21	200.0	
WNWSFM	Jackson, TN	268	A	231.78	200.0	
KPLA	Columbia, MO	268	C2	266.49	224.0	1, 2, 4
KPLA	Columbia, MO	268	C1	277.73	245.0	1, 5, 7
KPLA	Columbia, MO	268	C1	290.14	245.0	5, 12
WBNQ	Bloomington, IL	268	B	319.27	270.0	1, 2
WBNQ	Bloomington, IL	268	B	320.22	270.0	
WKKG	Columbus, IN	268	B	366.56	270.0	
97-168	Arcadia, MO	269	A	81.81	133.0	9, 11
WGEL	Greenville, IL	269	A	134.16	133.0	
WCMTFM	Martin, TN	269	A	156.04	133.0	3
KLPW	Union, MO	269	A	156.17	133.0	
KLPWFM	Union, MO	269	A	156.18	133.0	7
WTYE	Robinson, IL	269	A	224.54	133.0	
KIYS	Jonesboro, AR	270	C	207.08	105.0	
WAJT	Mount Vernon, IL	271	B1	97.83	77.0	2
WAJT	Mount Vernon, IL	271	B1	97.83	77.0	7
WCBF	Clinton, KY	271	C3	123.45	76.0	

* Required Spacing Per Section 73.207 of The FCC Rules

TABLE 2.0 (cont'd)

FM ALLOCATION STUDY - CHANNEL 268C1 (101.5 MHz) - CARBONDALE, IL

 LYLE BROADCASTING CORP.
 CARBONDALE, IL

STUDY COORDINATES: 37/37/00 89/38/30

STATION -----	LOCATION -----	CHANNEL -----	CLASS -----	SPACING (km) -----	REQUIRED SPACING* (km) -----	NOTES -----
KFXEFM	Cuba, MO	271	A	163.39	75.0	2, 3, 8

* Required Spacing Per Section 73.207 of The FCC Rules

Notes:

- | | |
|--------------------------------------|----------------------------------|
| 1 - Applied For Under Section 73.215 | 7 - Pending Application |
| 2 - Construction Permit | 8 - Petition For Reconsideration |
| 3 - Channel Deletion Proposed | 9 - Proposed Rulemaking |
| 4 - Move From This Channel Ordered | 10 - Rulemaking Petition |
| 5 - Move to This Channel Ordered | 11 - Short-Spaced |
| 6 - One Step Reference Site | 12 - Vacant Allotment |

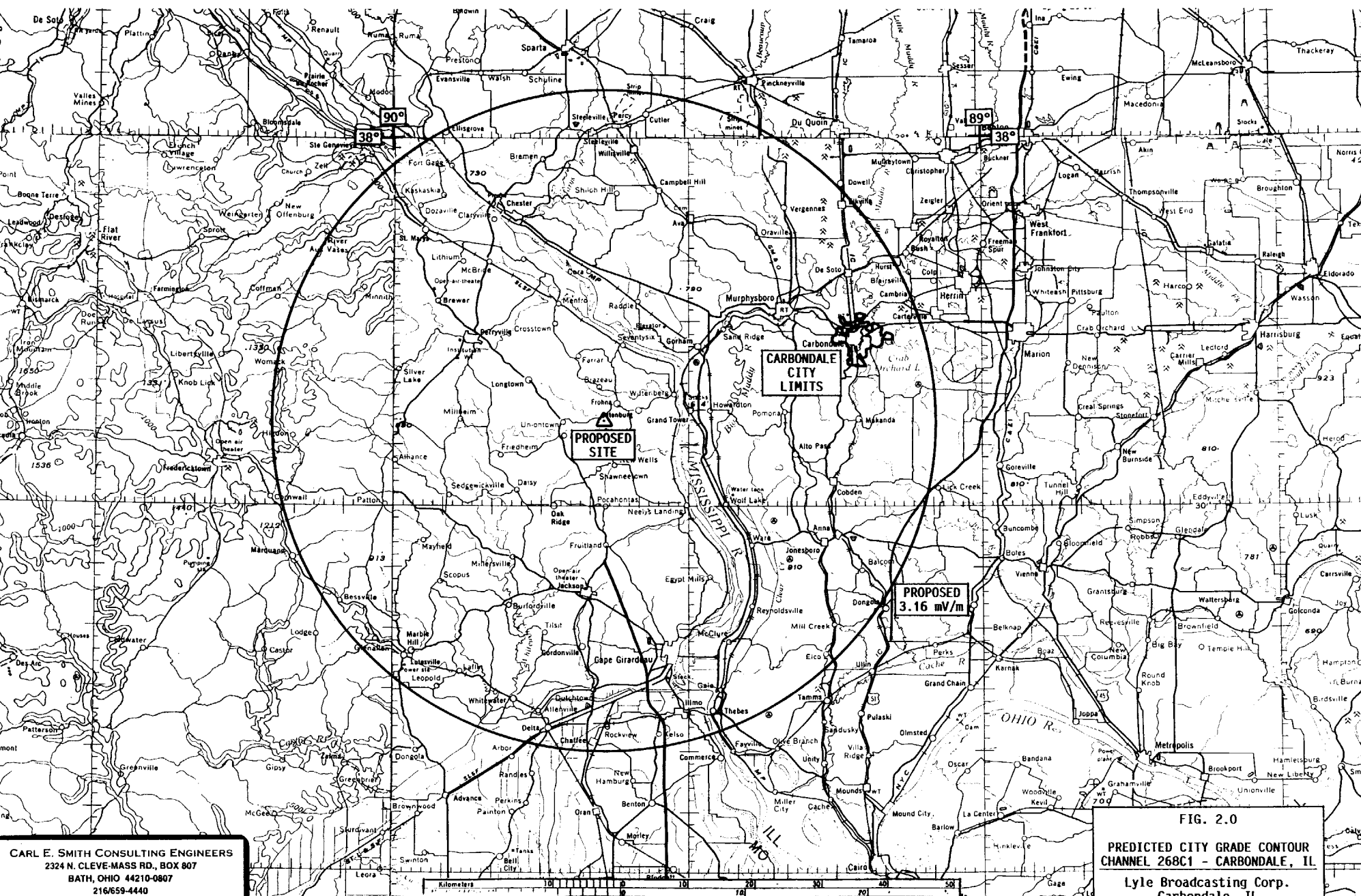


TABLE 2.1

FM ALLOCATION STUDY - CHANNEL 267C3 (101.3 MHz) - TIPTONVILLE, TN

LYLE BROADCASTING CORP.
CARBONDALE, IL

STUDY COORDINATES: 36/19/41 89/23/18

STATION -----	LOCATION -----	CHANNEL -----	CLASS -----	SPACING (km) -----	REQUIRED SPACING* (km) -----	NOTES -----
KLUH	Poplar Bluff, MO	213	A	100.17	12.0	
WKNQ	Dyersburg, TN	214	C1	26.81	24.0	
KGMO	Cape Girardeau, MO	264	C	116.45	96.0	
BPH970115MC	Middleton, TN	264	C3	137.14	43.0	7
WVHR	Huntingdon, TN	265	A	93.18	42.0	4
WVHR	Huntingdon, TN	265	C3	99.79	43.0	5, 12
KJMS	Memphis, TN	266	C1	147.10	144.0	
WJZC	Russellville, KY	266	C1	243.23	144.0	
WCMTFM	Martin, TN	267	C3	40.39	153.0	9, 11
96-204	Princeton, KY	267	A	157.99	142.0	9
96-220	Sturgis, KY	267	A	184.30	142.0	9
KTXR	Springfield, MO	267	C	330.91	237.0	
WNWSFM	Jackson, TN	268	A	93.69	89.0	
WTPRFM	Mckinnon, TN	268	A	127.77	89.0	
WCILFM	Carbondale, IL	268	C1	144.77	144.0	10
WCILFM	Carbondale, IL	268	B	155.50	145.0	3
WCMTFM	Martin, TN	269	A	48.55	42.0	3
KIYS	Jonesboro, AR	270	C	124.70	96.0	

* Required Spacing Per Section 73.207 of The FCC Rules

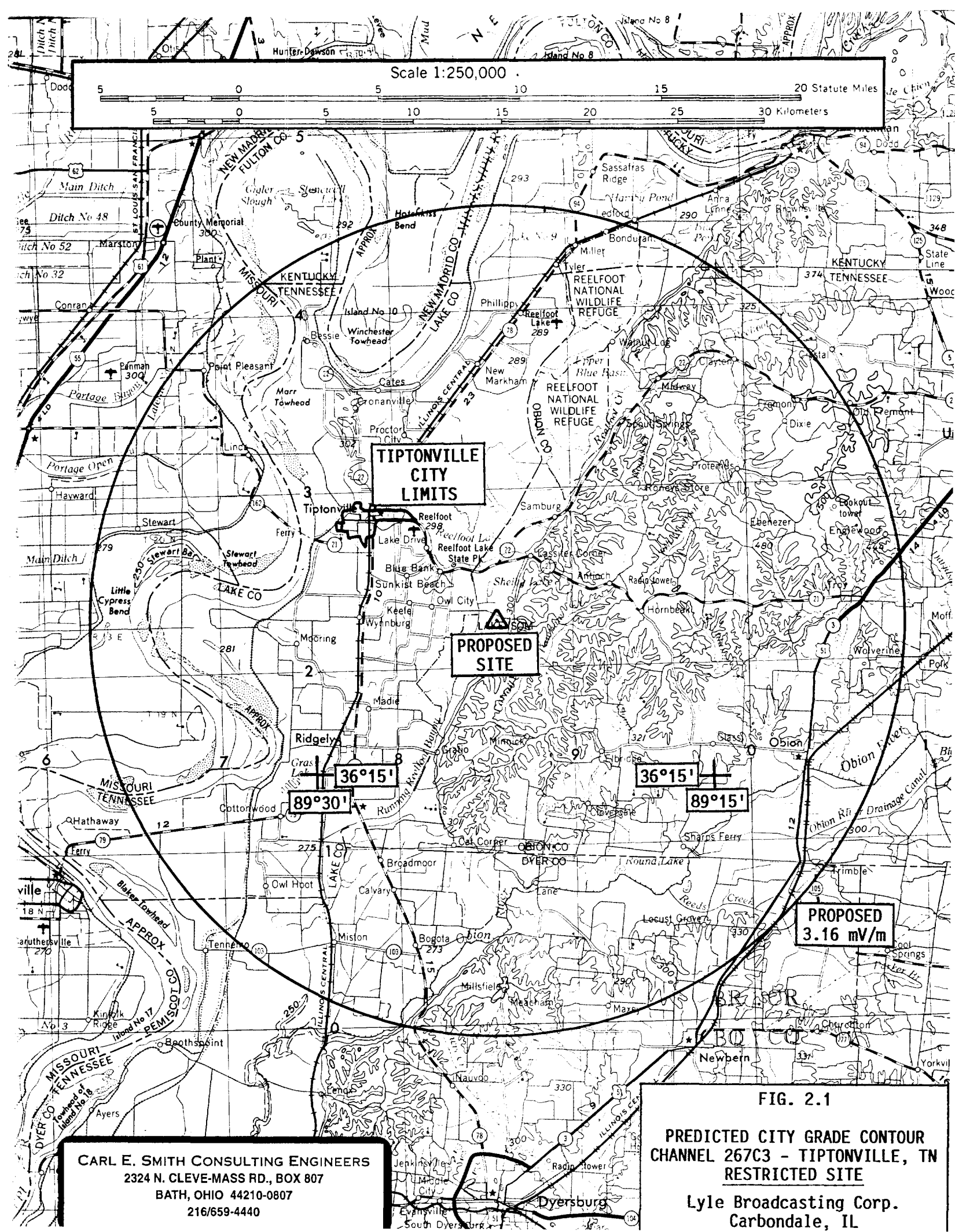
TABLE 2.1 (cont'd)

FM ALLOCATION STUDY - CHANNEL 267C3 (101.3 MHz) - TIPTONVILLE, TN

LYLE BROADCASTING CORP.
CARBONDALE, IL

Notes:

- | | |
|--------------------------------------|----------------------------------|
| 1 - Applied For Under Section 73.215 | 7 - Pending Application |
| 2 - Construction Permit | 8 - Petition For Reconsideration |
| 3 - Channel Deletion Proposed | 9 - Proposed Rulemaking |
| 4 - Move From This Channel Ordered | 10 - Rulemaking Petition |
| 5 - Move to This Channel Ordered | 11 - Short-Spaced |
| 6 - One Step Reference Site | 12 - Vacant Allotment |



Scale 1:250,000

5 0 5 10 15 20 Statute Miles
5 0 5 10 15 20 25 30 Kilometers

**TIPTONVILLE
CITY
LIMITS**

**PROPOSED
SITE**

36°15'
89°30'

36°15'
89°15'

**PROPOSED
3.16 mV/m**

FIG. 2.1

**PREDICTED CITY GRADE CONTOUR
CHANNEL 267C3 - TIPTONVILLE, TN
RESTRICTED SITE**

**Lyle Broadcasting Corp.
Carbondale, IL**

**CARL E. SMITH CONSULTING ENGINEERS
2324 N. CLEVE-MASS RD., BOX 807
BATH, OHIO 44210-0807
216/659-4440**